

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| THU TRAN, Individually and On Behalf of All: | : | Civil Action No. 1:07-cv-03754-RMB |
| Others Similarly Situated, | : | |
| | : | <u>CLASS ACTION</u> |
| Plaintiff, | : | |
| vs. | : | |
| NETLIST, INC., et al., | : | |
| Defendants. | : | |
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| RAGAA BENJAMIN, Individually and On | : | Civil Action No. 1:07-cv-05518-RMB |
| Behalf of All Others Similarly Situated, | : | |
| | : | <u>CLASS ACTION</u> |
| Plaintiff, | : | |
| vs. | : | |
| NETLIST, INC., et al., | : | |
| Defendants. | : | |
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DECLARATION OF DAVID A. ROSENFELD IN SUPPORT OF THE MOTION OF IRON
WORKERS LOCAL NO. 25 PENSION FUND FOR CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

David A. Rosenfeld, declares under penalty of perjury:

1. I am a partner with Lerach Coughlin Stoia Geller Rudman & Robbins LLP (“Lerach Coughlin”). I submit this Declaration in support of the motion of Iron Workers Local No. 25 Pension Fund (“Iron Workers”) for consolidation, appointment as Lead Plaintiff and for approval of selection of Lead Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the first notice published regarding the pendency of these actions, published by plaintiff in *Tran v. Netlist, Inc.*, et al., Civil Action No. 1:07-cv-03754-RMB (the “*Tran* Action”), on *Marketwire*, a national, business-oriented newswire service, on May 28, 2007.

3. Attached hereto as Exhibit B is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated collective losses of Iron Workers at approximately \$480,121.23, in connection with its transactions in Netlist, Inc. shares during the Class Period.

4. Attached hereto as Exhibit C is the certification of Iron Workers.

5. Attached hereto as Exhibit D is a true copy of the firm resume of Lerach Coughlin.

DATED: July 27, 2007

/s/ David A. Rosenfeld
DAVID A. ROSENFELD

CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on July 27, 2007, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Iron Workers Local No. 25 Pension Fund For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Declaration of David A. Rosenfeld In Support Of The Motion Of Iron Workers Local No. 25 Pension Fund For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

NETLIST (NY)

Service List - 7/25/2007 (07-0131N)

Page 1 of 1

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